

Affidavit of Brianna Kube

State of Pennsylvania

County of Allegheny

Brianna Kube, being duly sworn deposes and states as follows under penalty of perjury:

1. My name is Brianna Kube, I am presently 41 years old, and my current address of residence is 741 Florence Ave Apt B, Pittsburgh, Pennsylvania 15202.
2. The purpose of this Affidavit is to Confirm the validity of documents requested by Courtney Conover on Civil Action 5:21-cv-05574-JMG; being one, a file given to festival management regarding behavioral incidents of Gene "Quinn" Harlin, and two, copy of an email regarding instructions not to reach out to Kayla Miller.
3. I confirm that these are the documents requested. No additions, deletions or revisions have been made.

I hereby swear or affirm that the information above is true accurate and complete to the best of my knowledge, and that no relevant information has been omitted.

Dated:

5/10/2022

Signature of Individual:

Brianna Kube

Tyler M. Rietze

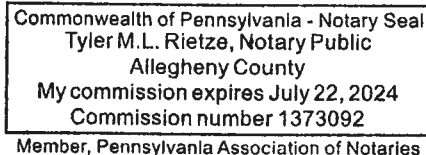
Notary Public

Title And Rank

Notary Public

Date Of Commission Expiry

07/22/2024



Member, Pennsylvania Association of Notaries

PRF-HR-#2: Harlin, David "Quinn"

1/10/2020

It was brought to my attention last week by a confidential source that an accusation of penetrative non-consensual sexual assault (hereafter referred to as rape) has been reported by a person who wishes to remain anonymous against former PRF cast member David "Quinn" Harlin. At this stage, I have only been informed that the event in question took place within the last calendar year, occurred either in the Pittsburgh area or in West Virginia during the timeline of the festival there, and the complainant is a member of one or both casts. The confidential source, who also wishes to remain anonymous, in case by their identity we should be able to identify the complainant, whom they have promised to protect, is a third party, non-cast member of the greater east coast ren fest community, and as such, has no immediate connection to either performance cast, and no agenda in reporting this complaint to me, other than concern for this person, our cast, and the faire community in general.

Pursuant to my being able to make a further investigation into the complaint, I would like to make the following observations regarding previous complaints lodged against Mr. Harlin, in connection with behavioral patterns that seem to support the current allegation, and my recommendations therein.

- 1) Mr. Harlin's known predilection for being attracted to much younger women, dating back to his earliest days as a playtron and cast member at PARF, where he was observed actively pursuing a 15 year old cast member.
- 2) Accusation of assault by Rachel Hull. This was prior to having our investigative protocols in place, and it was later determined that inappropriate comments made by Mr. Harlin were the basis for the complaint.
- 3) Accusation of assault by Kayla Miller, backed up by Shawn Howland; further accusation of Mr. Harlin being protected by management, by same complainants. Accusations were made public after Kayla was forced by EDs to work in proximity to Mr. Harlin, and when she refused, she was publicly blasted, causing her to leave site. Incident and allegations were never investigated, and further looking into the matter was directly forbidden by EDs.
- 4) Rumors and accusations of improper behavior with Amy Hotovchin while she was potentially under age.
 - a) Mr. Harlin's version of events around this allegation has changed multiple times over the years. The first time he relayed it to me, she had pursued him by sending inappropriate photographs and explicit chats, which he rejected, and attempted to mentor her as a brother. The next time he revisited the story, they had kissed once, at Funky Formal, and he was considering pursuing her, as she was over the statutory age at that point, but then he dropped the idea when she was seen engaged in an embrace with someone else. The final version of the story is that "yeah, they made out a couple times, but he ALWAYS shut it down before it went too far." Brennan Bobish can confirm that while she lived with Mr.

Harlin, she came home, and the two were on the couch, and another roommate told her they had apparently been engaged in what looked to be making out. Needless to say, I cannot hold any version of the story in a strong sense of confidence.

- b) It is Mr. Harlin's belief that Amy then acted out of hurt and rejection when she approached him again last year to revisit their relationship, and he denied her, and she "took revenge" by engaging in information sharing against him described in point 5.
 - c) Ms. Hotovchin, when pressed upon the matter both in WV (privately, following HR protocol) and PRF (publicly, in front of the cast) had a trauma reaction, becoming hysterical, and insisting nothing happened, and she was afraid of saying any more. When comforted, she admitted that SOMETHING had happened, but that she had been of age, and it was consensual. Her blatant fear reaction leads me to believe the relationship was more intimate than we may have been told, but so far her story to both Anne Rematt (WV HR) and myself lines up.
 - d) Following that conversation at PRF, both Ms. Hotovchin and Mr Harlin were given strict instructions to stay away from each other, comport themselves professionally, and never speak TO or ABOUT each other, to which both agreed. Ms. Hotovchin abided by this promise. Mr. Harlin did not. I have been advised that he slandered Amy to a group of patrons (the drunken, indiscreet tailgate crew), that HE was a victim, and they should not interact with her. When she later approached them to greet them, they reportedly loudly told her to fuck off, that she was trouble, and they were on Team Quinn. This is a DIRECT violation of an explicit instruction given to Mr. Harlin by the directorial team, and serious and troubling libel of a person still considered a minor by the state of Pennsylvania. Furthermore, it is a profoundly unprofessional indiscretion to share private, HR-related issues with the general public, who could then contribute to more rumors and PR issues for the festival, including lawsuits.
 - e) Mr. Harlin was also heard to have said that Amy was such a cock tease, she DESERVED it if she got raped.
- 5) Accusation of improper behavior with Emarya Montgomery, by Marjorie Roper.
- a) This accusation was based in part on several key pieces of evidence, including:
 - i) A private admission by Ms.Hotovchin to Ms. Roper that she and Mr. Harlin had been intimate in some way while she was still a minor.
 - ii) Mr. Harlin and Ms. Montgomery being seen on the grounds holding hands, not in an "escort" position.
 - iii) It has also been made known to me that Mr. Harlin admitted that Ms. Montgomery's's father walked in on them on the couch in their family home, cuddled up and having a very explicit conversation. When her father, rightly, was irate, Mr. Harlin made excuses about why it wasn't improper.
 - iv) Mr. Harlin was frequently overheard joking, "I forget how young she is sometimes."

- v) After the blowup of gossip and HR investigation at WV, Ms. Montgomery decided to withdraw from social contact from Mr. Harlin. When confronted with the realization that Ms. Montgomery had unfriended him, and then blocked him, on Facebook, Mr. Harlin requested that I immediately request her as a friend so I could "keep an eye on her, make sure she was ok." When I expressed that I was not comfortable monitoring a person I had never met on behalf of a person she clearly had no interest in making her social life available to, he was irate. This to me does not seem to be a reasonable reaction for a person who claims to have wanted her happiness and safety, and to have supposedly respected her choices.
- 6) Dressing room behavior.
 - a) Mr. Harlin's frequent pattern of striding about the co-ed dressing room clad only in his fitted briefs, engaging in long conversations with people while nearly naked, made many cast members deeply uncomfortable.
- 7) Weapons infractions and cast safety.
 - a) Mr. Harlin was repeatedly observed leaving his personal weapons, while on cast, in various spots around the shire, while he performed some task without them. He would often lean his sword or spear against a wall or building, hand off one of his many daggers to another cast member, or leave them on a bench, or throw his spear, sword or dagger into the ground, leaving it upright where any patron could encounter it. The cast would frequently have to clear his weapons from the open public spaces in the interest of safety, as his weapons were always razor sharp. In one instance, when carrying his spear over his shoulder, he clipped the edge of Anne Rematt's crown, and refused to accept that this was possible, because according to him, he's never careless with his weapon, but multiple people observed it. He was also observed growing irate with fellow cast members at their attempts to assist a disabled patron, and literally flung his spear into the ground some way away, which any patron could have been hit by, walked into or stumbled over. This caused Steven Loy, PRF cast member and VARF fight choreographer, to pull him aside and remonstrate him strenuously for his reckless handling of his weapons in the presence of patrons. Michael Moody, who has professional fencing training and is a certified combat choreographer, also brought several concerns about his observations of Mr. Harlin's carelessness to management, and was essentially blown off, instead of thanked for his concern. Any other cast member, if they repeatedly behaved in such a manner, would have their privilege of carrying a weapon on site revoked immediately by our armorer, fight captain and the ED, so the same expectation should have been levied on Mr. Harlin as well, despite his tenure and friendship with much of the management staff.

At this point in time, I do not know more about the alleged event in question. We do not know who the complainant is, and for their safety and to honor their wishes, it would behoove us to

not make any assumptions, nor attempt to "out" them based on guesses. It is my contention, however, that this outline presents a clear pattern of reckless, untruthful, manipulative, and at times completely unacceptable behavior congruent with the allegation; and that the behavior described has been largely excused on multiple pretexts, such as, "We can't lose him, we need guys," or "she probably lied"/victim blaming or "he doesn't mean it, he just doesn't have a filter." In the current atmosphere around harassment and assault claims at multiple renaissance festivals around the country, we CANNOT afford to let an allegation as serious as rape slip by with a "boys will be boys" mentality, or let there be any inference whatsoever that the directorial, management and ownership teams were presented with a serious and credible allegation of a crime, and knowingly allowed the potential perpetrator freedom of the shire without due process.

We created a solid foundational document last year with our code of conduct and harassment policy, and while these are not binding documents, they do provide us with a way to navigate these uncomfortable but necessary processes. We have a duty of care to our cast and to the larger PRF and WV faire communities to honor that process, follow it scrupulously, and lead by example. We have to be unimpeachable in our conduct with this.

It is my strenuous recommendation that until such time as an investigation has been concluded beyond reasonable doubt one way or another, that Mr. Harlin not rejoin the cast, should that be a possibility. We of course have no say in his being employed elsewhere by the festival or vendors, although I think the visual on that is profoundly dangerous to the process, and could render ownership liable. However, my vehement advocacy as cast HR officer and assistant director is that he not return.

1/12/2020

After discussing notes above with directorial cast/EDs, the following steps are being taken:

- 1) Mr. Harlin will not be allowed back on cast until this is resolved satisfactorily; the safety of the cast and community is paramount.
- 2) I have been instructed to confirm with Ms. Hotovchin about the tailgate incident, and with Mr. Montgomery about the living room incident, with the assistance of James Amor, ED for both festivals.

It has come to my attention from Source B (the source of the allegations regarding the above incidents, not the allegation of rape, who shall be referred to as Source A going forward), that they can confirm Mr. Harlin admitted to them that he was in a PATRON's truck during the time he allegedly libeled Ms. Hotovchin and spoke about HR matters with the public, and it was during working hours when he should have been performing his grounds crew duties. It was also alleged that he laughed in recounting the story. It is further advised that he was NOT present when they allegedly spoke harshly to Ms. Hotovchin, so unless she confirms that part of the story, he was only recounting the fact that it happened to Source B, as he heard about it after the fact, and not the contents of what was said. I am reaching out to Ms. Hotovchin. James Amor and I will subsequently be contacting Mr. Montgomery. It is felt that as I have no

connection to WV and am not known there that a known person such as James Amor would be helpful in broaching the discussion, and a witness should be present in both cases.

It was also decided as a directorial/management team, that this topic will not be spoken of with Mr. Harlin. We need to be able to do our investigation without misdirection or defensive tactics, and it was agreed also that, knowing Mr. Harlin's temper, we are not certain he would not lash out verbally or physically in retaliation against either young lady, the investigative team, or anyone he thinks might be a source.

1/17/2020

I spoke with Ms. Hotovchin specifically about the alleged incident in the parking lot. She says she cannot confirm the incident, as she does not recall being spoken to harshly by patrons. If the information was shared with these patrons by Mr. Harlin, it does not seem to have made its way back to Ms. Hotovchin. She did inform me, however, that a vendor advised her to be careful, that Mr. Harlin was telling multiple people around site that she was "trouble."

I reached out to this vendor, who did advise that Mr. Harlin had spoken to them at length while on site, telling them that he was a victim, that Ms. Hotovchin was the bad guy. This information was not sought out by the vendor, the conversation was unprompted and unwelcome. The vendor, who also works the WV faire, indicated that Mr. Harlin said similar things at WV, and his reputation for preferring inappropriately young women was well known and discomfiting.

I reported this information back to ED James Amor, who promptly discounted anything shared by this vendor, merely because they are friends with Marjorie Roper at the WV festival. While Ms. Roper was the source of some ill advised gossip and jumping into situations she did not have all the facts on, her involvement does not automatically make the information she had wrong. Nor does it in any way impair the credibility of this vendor, who reached out to Ms. Hotovchin out of concern. But in Jim's opinion, this rendered the information entirely invalid.

When I pressed him on the other branch of investigation, reaching out to Mr. Montgomery to confirm the allegation about Mr. Harlin's behavior with Mr. Montgomery's daughter, Jim advised that he and Patti would just handle it while they were in WV for auditions, and that I didn't need to be involved further. He also strenuously implied that I seemed to be on a witch hunt, while I was merely following the path we had agreed upon previously. I advised my only interest was to ascertain as much of the truth as we could, while protecting the cast from further issue, and the festival from potential lawsuit.

Since we have no further information on the rape allegation and cannot investigate further without potentially harming the alleged victim, I am handing my notes over to management for review and advisement.

BMK 1/17/2020

Status: Open, pending higher review. No further action to be taken until otherwise advised by senior leadership.

Note as of 5/10/2022: There was no performance season following these notes in 2020. In the 2021 season, Mr. Harlin was neither on cast nor grounds crew at PRF.



Brianna Kube <rubysunshine32@gmail.com>

Re: Colorado is now under the looking glass

1 message

James Amor <damor@pittsburghrenfest.com>

Wed, Jul 24, 2019 at 12:01 PM

To: Brianna Kube <rubysunshine32@gmail.com>

Cc: Jimmy Amor <jimmyamor57@gmail.com>, Patti Amor <momamor@yahoo.com>, Scott Walton <scott.walton1@yahoo.com>, Christine Rauch <clrauch@hotmail.com>, Brennan Bobish <brennanbobish@yahoo.com>, Michael Menendez <michaeldarkbear@gmail.com>

**JESUS CHRIST, NO DON'T GET KAYLA
WORKED UP ON THIS. Leave sleeping dogs
lie.**

Doc

On Wed, Jul 24, 2019 at 12:00 PM James Amor <damor@pittsburghrenfest.com> wrote:

Bri, got to disagree here with you. A policy has to be well crafted and the changes that come from this case may very well play a role in what is now needed in a policy. So we have to sit tight. The second part of this trial is what is an independent contractor and what is an employee. That will have a huge impact and will affect hiring because of the extra expense in payroll taxes.

Doc

On Wed, Jul 24, 2019 at 11:58 AM Brianna Kube <rubysunshine32@gmail.com> wrote:

Which I think is backwards, because unless he is seen to be taking steps to protect people under his umbrella, and himself and his business in the process. I think this is JUST the time to put a well-drafted policy into place. it may be "too little too late" for some people's opinions, but it will give the impression that we're trying to be better and safer. But, that's just my opinion.

On Wed, Jul 24, 2019 at 11:54 AM James Amor <damor@pittsburghrenfest.com> wrote:

Until this case is complete I totally see Jim Paradise's reluctance to put a policy in place until he is advised by legal counsel on what it needs to be based on this suit. And don't kid yourself, this can have huge impacts on renfests across the country.

Doc

On Wed, Jul 24, 2019 at 11:52 AM Brianna Kube <rubysunshine32@gmail.com> wrote:

I agree, I think the work we have done and the conversation we have had, amongst the directors and with the cast at large, will be invaluable in the days and weeks to come.

On Wed, Jul 24, 2019 at 11:41 AM James Amor <damor@pittsburghrenfest.com> wrote:

We are ahead of the curve on this at Pittsburgh. Read the first sentence of the fifth paragraph in this new article.

<https://www.diversityinc.com/former-colorado-rennaissance-festival-employee-michele-st-michael-sues-for-workplace-discrimination/?fbclid=IwAR1vJyXwWTJfNSPIBFcc1pmnywmdpyni6ZJoYzZuOiH1f2jOqyaCBX18x9o>

Doc

On Wed, Jul 24, 2019 at 10:49 AM James Amor <damor@pittsburghrenfest.com> wrote:

This was what JP was referring to when he wanted to see where this went and what the policy going forward would need to be. This will impact ALL renfests going forward. I can see Dave Walker saying what he said but not as a request for a favour. Once this story gets into Kayla's hand, expect the heat to really pick up. BTW, Marjorie posted this article at about 2AM, and Marjorie is now friends with Rachel, and Rachel is friends with Kayla. So yeah, should be interesting. We will see what we have left to do a show with.

Doc

On Wed, Jul 24, 2019 at 10:34 AM Jimmy Amor <jimmyamor57@gmail.com> wrote:

By now have we all seen this?

<https://www.westword.com/news/colorado-renaissance-festival-sued-for-sexual-harassment-employment-discrimination-11419782?fbclid=IwAR1pgmMAi2mMfAjSQkL44EH0MHIHMAbk4w9ZWIKYMr53sAmzdePVI8KPPNo>

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Cheers,

Jimmy Amor

Facilities Manager and Assistant Technical Director

Department of Music and Theatre

California University of Pennsylvania

www.calu.edu

Assistant Director, Armorer & Fight Choreographer

Entertainment Street Performers

Pittsburgh Renaissance Festival

www.pittsburghrenfest.com



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Would it be worth it for one of us to reach out to Kayla, should there be rumblings in that direction, and go hey, look, we know there's some history here. We didn't have a policy then. We're sorry. We do now, and we're trying to do better, and if you would like to have your complaint from then listened to and investigated as much as possible, given the time that's passed since then, we will do so?

On Wed, Jul 24, 2019 at 11:56 AM James Amor <damor@pittsburghrenfest.com> wrote:

Bri, yes Quinn may have done a big favour. But what about Eric? What about me? According to Kayla, I admired her butt. What about any of the guys on cast? What about Michael and Jimmy? What about some of the girls who no longer feel safe and will rather not do festival? Yeah this could be a huge mess. And Kayla would throw an angry hornet's nest into the whole thing.

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Cheers,
Jimmy Amor

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